

TruePosition, Inc. v. Andrew Corporation, No. 05-747-SLR
Andrew Corporation's Objections, Counter-Designations,
and Rebuttal Designations
August 10, 2007

The following is a list of Andrew's objections, counter-designations, and rebuttal designations in response to TruePosition's deposition designations. Andrew reserves the right to supplement these objections and counter-designations as it completes its work on the pretrial order. Andrew incorporates its Objections to TruePosition's Trial Exhibit List and reserves the right to make additional objections to documents that are the subject of these designations. Andrew reserves the right to make additional objections and counter-designations to those designations that are incomplete as listed here. Andrew incorporates its Evidentiary Issues by reference and reserves the right to supplement these objections and counter-designations based on the Court's rulings on those Evidentiary Issues. Andrew reserves the right to supplement these objections and counter-designations based on the Court's rulings on the pending claim construction issues and summary judgment issues. Andrew reserves the right to supplement these rebuttal designations if a witness that is anticipated to testify at trial fails to appear at trial.

KHALID AL-MUFTI (11/21/06)

TP's Designation	Andrew's Objections
6:10-9:14	7:19-9:14 - relevance ¹ ; see Andrew Evidentiary Issue No. 9
9:16-11:15	Relevance; see Andrew Evidentiary Issue No. 9
11:22-12:18	Relevance; see Andrew Evidentiary Issue No. 9
12:20-13:3	Relevance; see Andrew Evidentiary Issue No. 9
13:5-13:9	Relevance; see Andrew Evidentiary Issue No. 9
13:11-14:3	Relevance; see Andrew Evidentiary Issue No. 9
14:5-15:25	Relevance; see Andrew Evidentiary Issue No. 9

¹ As used herein, "relevance" objections encompass objections under both FRE 402 and 403.

16:9-17:6	Relevance; see Andrew Evidentiary Issue No. 9
19:20-19:22	Relevance; see Andrew Evidentiary Issue No. 9
19:24-21:3	Relevance; see Andrew Evidentiary Issue No. 9
21:5-21:9	Relevance; see Andrew Evidentiary Issue No. 9
21:12-22:7	Relevance; see Andrew Evidentiary Issue No. 9
22:9-24:5	22:9-24:1 - relevance; see Andrew Evidentiary Issue No. 9
24:7-24:14	
24:19-26:17	24:19-25:16 - relevance; see Andrew Evidentiary Issue No. 9 25:17-26:17 - relevance
27:3-28:9	Relevance
28:11-29:18	Relevance
30:6-32:12	Relevance 32:8-12 - speculation; foundation
32:20-33:20	Relevance; speculation
33:23-36:6	33:23-34:10 - speculation; relevance 34:11-36:6 - speculation; relevance
49:14-50:22	Relevance
50:24-51:5	Relevance
58:5-62:10	Relevance 59:12-60:12 - speculation 61:9-21 - speculation

Andrew's Counter-Designations
11:16-21
42:21-23

ANDREW BECK (9/22/06)

TP's Designation	Andrew's Objections
8:6-20	
11:15-14:3	
21:9-22:2	21:25-22:2 - foundation
22:4-16	22:14-15 - foundation
22:17-25:8	
36:21-25	
37:10-39:22	39:21-22 - foundation
39:25	
40:22-41:7	
41:9-13	

41:15-42:9	
42:11-46:4	
46:7-23	
49:7-16	
49:18-20	
51:7-25	Relevance; authentication; foundation
54:15-55:18	Relevance; authentication; foundation; hearsay
56:25-57:2	56:25 - improper designation - incomplete
57:5-22	57:16-22 - relevance; authentication; foundation; hearsay
57:25-58:22	Relevance; authentication; foundation; hearsay 58:21-22 - improper designation: incomplete
59:18-61:25	59:18-60:21 - improper designation: incomplete; relevance; authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself 61:18-62:2 - relevance; authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself
62:3-64:7	Relevance; authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself
83:12-16	Improper designation: incomplete
114:24-116:22	Authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself
116:25-120:15	116:25-117:2 - attorney comment 117:8-118:22 - authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself 119:6-120:8 - relevance 120:13-15 - foundation
120:18-125:22	120:18-19 - foundation 120:21-121:4 - relevance 121:5-122:10 - authentication; foundation; hearsay; speculation; incomplete; context; best evidence; improper designation: document speaks for itself 122:25-123:9 - authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself

	123:21-124:9 - speculation
	124:10-125:16 - authentication; foundation; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself
132:7-23	132:17-132:23 - foundation
139:16-19	139:19 - foundation
139:21-24	Foundation
140:1-11	140:9-17 - foundation
140:13-17	See above
142:7-143:6	143:3-6 - foundation
175:10-13	
175:16-25	
176:24-177:22	
179:18-22	
197:20-199:14	Relevance; see Andrew Evidentiary Issue No. 9
199:25-202:11	Relevance; see Andrew Evidentiary Issue No. 9
202:13-23	Relevance; see Andrew Evidentiary Issue No. 9
207:3-207:6	Relevance; see Andrew Evidentiary Issue No. 9
207:8-13	Relevance; see Andrew Evidentiary Issue No. 9
207:16-208:2	Relevance; see Andrew Evidentiary Issue No. 9
209:7-25	Relevance; improper designation: incomplete
215:8-19	Relevance; see Andrew Evidentiary Issue No. 9
	215:8-9 - improper designation: incomplete
215:21-217:25	Relevance; see Andrew Evidentiary Issue No. 9
238:15-239:6	Misleading; vague; context; relevance
255:13-15	Foundation
255:17-256:4	
256:6-9	
261:12-19	Relevance; hearsay; authentication; foundation
295:2-297:2	295:24-296:19 - relevance; incomplete; context; best evidence; improper designation: document speaks for itself
297:6-298:12	
302:24-303:7	Relevance; see Andrew Evidentiary Issue No. 4
303:16-17	Relevance; see Andrew Evidentiary Issue No. 4
303:23-304:22	Relevance; see Andrew Evidentiary Issue No. 4
304:24-305:4	
305:6-13	305:11-25 - relevance
305:15-17	See above
305:19-306:3	See above
	306:1-2 - relevance
306:6-306:8	Relevance

Andrew's Counter-Designations
40:3-6
40:18-21
47:17-20
48:3-19
49:22-50:4
52:11-15
56:5-10
56:24
64:8-13
82:14-21
83:17-19
84:3-9
176:2-4
177:23-179:6
179:23-180:3
180:25-181:12
202:24-203:6
203:24-204:4
205:4-20
215:13-20

GARY BROWN 30(b)(6) (11/7/06)

TP's Designation	Andrew's Objections
7:2-7:9	7:2-7:7 - relevance
7:17-8:5	
10:21-11:21	
13:21-16:7	
28:21-29:17	
37:16-41:3	
41:6-43:25	43:19-25 - relevance; see Andrew Evidentiary Issue No. 6
44:7-44:14	44:12-14 - relevance; see Andrew Evidentiary Issue No. 6
45:15-46:10	
46:23-47:4	
47-13-48:8	
48:12-48:16	
50:22-51:2	
55:11-57:21	
59:17-61:14	
62:2-62:15	
64:21-65:10	
65:23-66:3	

66:6-66:20	
67:21-67:24	
69:24-70:10	
73:12-73:23	Relevance; authentication
79:11-79:22	Relevance; improper designation: incomplete
89:14-89:25	Relevance
90:10-90:16	Relevance
97:24-98:22	
100:13-100:15	
102:10-103:11	Relevance
104:9-105:8	104:9-11 - relevance
106:16-106:17	Beyond the scope; relevance; see also Andrew Evidentiary Issue No. 4.
106:19-107:20	Relevance; see also Andrew Evidentiary Issue No. 4
108:3-110:21	109:22-110:21 - relevance; see Andrew Evidentiary Issue No. 4 110:10-21 - beyond the scope
111:6-111:20	
111:25-112:24	Relevance
113:18-116:21	
117:3-117:17	
117:24-118:10	Relevance; Andrew Evidentiary Issue No. 4
127:7-130:3	Authentication; hearsay; speculation
142:8-144:15	Authentication; foundation; hearsay
159:23-162:20	
170:14-171:6	
173:22-173:24	Hearsay
174:4-175:10	Hearsay; speculation; relevance 174:17-175:10 - beyond the scope; relevance; Andrew Evidentiary Issue No. 6
182:6-182:16	

Andrew's Counter-Designations
18:19-19:10
48:9-11
49:12-50:12
51:14-55:10
64:6-64:20
66:4-5
79:23
103:12-104:8
105:9-12
106:18
111:22-24

112:25-113:11
117:18-23
130:4-20
163:3-21
171:7-11

JOHN CARLSON (10/2/06)

TP's Designation	Andrew's Objections
8:3-6	Relevance
8:23-10:7	
10:17-11:2	10:17-21 - relevance
12:4-13:13	
13:17-14:15	
15:4-15:6	
15:24-16:7	
16:13-17:5	Relevance
18:13-19:24	Relevance
20:11-21:7	
22:24-23:14	Relevance
25:17-25:25	
26:4-26:11	
26:15-27:6	26:15-28:23 - relevance; see Andrew Evidentiary Issue No. 9
27:13-29:23	
30:17-19	
35:10-36:7	35:10-16 - authentication; foundation 35:23-36:7 - authentication; foundation 36:10-15 - authentication; foundation
36:10-36:21	
38:2-38:15	Authentication; foundation
40:17-40:20	
42:18-43:6	
49:19-49:24	Cumulative
50:12-50:18	
50:21-51:3	
51:6-51:8	
54:6-54:11	
55:14-55:17	
56:11-57:9	
57:14-57:25	

58:10-58:22	
58:25-59:14	
61:6-63:4	
63:23-63:25	
64:4-64:5	
64:19-64:23	
65:4-65:6	
65:10-66:19	
66:25-67:14	
67:20-71:6	
71:24-72:25	
73:8-73:12	
73:18-74:3	
74:17-76:2	
76:9-76:11	
76:18-77:15	
78:15-80:13	
80:18-80:20	
81:15-83:4	
83:18-85:6	
85:9-85:17	
86:5-86:6	
86:22-87:8	
88:11-88:24	
90:24-91:12	
91:15-96:11	
96:14-97:20	
98:1-102:9	
103:5-103:16	
104:10-104:14	
105:4-105:12	
105:25-109:14	
109:19-112:15	
113:3-113:12	
113:25-114:15	
115:5-115:13	Foundation; speculation
115:18-116:20	Foundation; speculation
118:7-118:12	
120:2-126:11	123:14-126:11 - relevance; see Andrew Evidentiary Issue No. 9
126:14-128:8	Relevance; see Andrew Evidentiary Issue No. 9
128:16-129:4	Relevance; see Andrew Evidentiary Issue No. 9
129:6-130:4	Relevance; see Andrew Evidentiary Issue No. 9
130:7-132:6	Relevance; see Andrew Evidentiary Issue No. 9
135:19-137:14	Relevance; see Andrew Evidentiary Issue No. 9
137:17	

138:5-139:13	138:5-139:2 - relevance; see Andrew Evidentiary Issue No. 9
139:18-148:20	Speculation
149:25-150:21	
151:10-151:22	
161:5-163:22	
165:14-165:19	
173:6-176:2	
176:24-177:3	
177:15-178:25	
188:15-189:23	Relevance
196:24-197:25	Confusing; foundation; authentication
199:12-199:22	Authentication; foundation; relevance; speculation; incomplete; context; best evidence; improper designation: document speaks for itself
201:18-202:25	
216:12-217:6	216:12-21 - relevance Misleading
217:14-217:23	Misleading; relevance
220:18-223:22	

Andrew's Counter-Designations
50:9-11
57:10-13
63:5-22
64:6-18
64:24-65:2
74:4-16
80:21-81:3
85:18-86:4
86:7-19
87:9-88:10
88:25-89:6
89:11-90:23
104:15-105:3
112:16-22
116:21-117:4
191:13-16
217:10-13

JOHN CARLSON 30(b)(6) (10/16/06)

TP's Designation	Andrew's Objections
6:10-6:24	
7:5-7:7	
7:13-8:5	
8:15-9:12	
9:14-9:19	
9:21-10:17	
10:19-11:6	
11:8-11:11	
11:13-12:15	
12:17-12:22	
12:24-13:9	
13:11-13:13	
13:16-13:18	
13:21-14:22	
14:24-15:8	
15:17-25	
19:3-19:17	
19:20-20:2	
20:6-22:4	20:21-22:4 - attorney testimony and colloquy
22:11-22:15	
23:9-23:11	
23:16-26:8	
26:12-26:19	
26:21-26:22	
26:25-27:12	
27:14-28:11	
32:4-32:20	
32:22-32:25	
33:6-34:5	
34:7-34:14	
34:16-35:7	
35:9-35:17	
35:19-36:10	
36:13-36:22	
36:24-37:7	
37:9-37:14	
37:16-38:9	
38:11-38:19	
38:21-38:22	
40:16-40:23	
40:25-41:17	
41:20-41:22	

41:24-42:5	
42:7-42:13	
42:15-43:2	
43:5-43:21	43:6-21 - relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
44:25-45:4	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
45:8-45:12	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
45:14-45:25	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
46:11-47:4	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
47:6-47:8	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
47:10-47:18	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
47:20-48:2	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
48:4-48:11	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
48:14-48:20	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
48:22-49:3	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
49:5-49:14	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
49:16-49:23	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
49:25-50:4	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
50:7-50:10	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
50:12-50:15	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
50:17-50:20	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
50:22-51:9	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
51:12-51:22	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
51:25-52:3	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
52:7-53:15	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
53:17-53:24	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope
54:2-54:4	Relevance; see Andrew Evidentiary Issue No. 9; beyond the scope

Andrew's Counter-Designations

45:5-7

45:13

MOHAMMED EISSA (10/31/06)

TP's Designation	Andrew's Objections
5:4-5:12	
7:12-8:24	
9:9-10:17	
12:12-12:17	
12:20-13:22	
14:1-17:14	
21:12-21:24	
34:18-37:20	
39:13-40:14	

43:12-43:14	See Andrew Evidentiary Issue No. 6
43:16-44:13	See above
49:22-49:23	See Andrew Evidentiary Issue No. 6
50:2-50:8	See above
50:11-50:16	See above
50:19-51:1	See above
51:3-52:3	See above
55:14-55:16	Relevance; see Andrew Evidentiary Issue No. 6
55:19-56:21	Relevance; see Andrew Evidentiary Issue No. 6
57:14-57:15	Relevance; see Andrew Evidentiary Issue No. 6
57:17-58:3	Relevance; see Andrew Evidentiary Issue No. 6
58:5-58:21	Relevance; see Andrew Evidentiary Issue No. 6
58:23-59:3	Relevance; see Andrew Evidentiary Issue No. 6
60:2-60:3	Relevance; see Andrew Evidentiary Issue No. 6
60:6-62:10	60:6 - 60:15 - relevance; see Andrew Evidentiary Issue No. 6 60:16 - 62:10 - relevance; speculation; foundation; vague; see Andrew Evidentiary Issue No. 6
62:12-62:21	Relevance; speculation; foundation; vague; see Andrew Evidentiary Issue No. 6
62:23-62:24	Relevance; speculation; foundation; vague; see Andrew Evidentiary Issue No. 6
63:2-63:9	Relevance; speculation; foundation; vague; see Andrew Evidentiary Issue No. 6
63:11-64:3	Relevance; speculation; foundation; vague; see Andrew Evidentiary Issue No. 6
64:5-64:19	Relevance; speculation; foundation; vague; assumes facts not in evidence; see Andrew Evidentiary Issue No. 6
64:21-65:19	Relevance; speculation; foundation; vague; see Andrew Evidentiary Issue No. 6
67:3-67:6	Relevance; speculation; foundation; confusing; see Andrew Evidentiary Issue No. 6
81:8-83:8	
83:10-84:6	82:10-16 - foundation 82:17-83:2 - speculation 83:20-86:25 - relevance; see Andrew Evidentiary Issue No. 6
84:15-86:24	See above
87:8-89:14	Relevance
92:11-94:16	Relevance; speculation; see Andrew Evidentiary Issue No. 6
94:18-95:17	Relevance; speculation; see Andrew Evidentiary Issue No. 6
95:19-96:1	Relevance; speculation; see Andrew Evidentiary Issue No. 6
96:4-96:7	Relevance; speculation; see Andrew Evidentiary Issue No. 6
96:9-96:24	Relevance; speculation; see Andrew Evidentiary Issue No. 6

97:3-98:13	Relevance; speculation; see Andrew Evidentiary Issue No. 6
98:16-99:4	Relevance; speculation; see Andrew Evidentiary Issue No. 6
99:7-99:21	Relevance; speculation; see Andrew Evidentiary Issue No. 6
103:24-107:8	Relevance; speculation; see Andrew Evidentiary Issue No. 6
107:10-108:20	Relevance; speculation; see Andrew Evidentiary Issue No. 6
108:22-110:3	Relevance; speculation; see Andrew Evidentiary Issue No. 6
112:9-114:9	Relevance; see Andrew Evidentiary Issue No. 6
120:17-122:10	Speculation
122:13-123:5	Speculation; hearsay 122:24-123:5 - improper designation; misleading; lawyer testimony
128:21-129:2	Relevance; see Andrew Evidentiary Issue No. 6
129:4-129:8	
136:8-137:9	Relevance; see Andrew Evidentiary Issue No. 6 137:9 - ambiguous
137:11-139:15	137:11-139:15 - relevance; speculation; see Andrew Evidentiary Issue No. 6
139:17-139:22	Relevance; speculation; see Andrew Evidentiary Issue No. 6
139:24-140:7	Relevance; speculation; see Andrew Evidentiary Issue No. 6
140:9-140:18	Relevance; speculation; see Andrew Evidentiary Issue No. 6
140:20-141:20	Foundation; relevance; speculation; see Andrew Evidentiary Issue No. 6
141:22-146:23	Foundation; relevance; speculation; see Andrew Evidentiary Issue No. 6; hearsay
147:1-147:2	Foundation; relevance; speculation; see Andrew Evidentiary Issue No. 6
147:4-148:15	Authentication; foundation; relevance; see Andrew Evidentiary Issue No. 6
148:17-149:15	Authentication; foundation; relevance; see Andrew Evidentiary Issue No. 6
149:17-152:23	149:17-149:25 - authentication; foundation; relevance; see Andrew Evidentiary Issue No. 6 150:1-151:10 - authentication; foundation; relevance; see Andrew Evidentiary Issue No. 6; hearsay 151:11-152:23 - authentication; foundation; relevance; see Andrew Evidentiary Issue No. 6
153:2-154:7	Authentication; foundation; relevance; speculation; see Andrew Evidentiary Issue No. 6; hearsay
154:10-155:2	154:10-13 - speculation; relevance; see Andrew Evidentiary Issue No. 6
155:4-155:20	154:23-155:6 - duplicative; vague

	155:7-155:20 - speculation; relevance
155:22-156:1	
156:3-156:7	
156:9-156:21	156:10-14 - relevance; hearsay 156:16-21 - speculation; relevance
156:23-157:3	Speculation; relevance
161:16-161:23	Speculation; relevance
162:2-162:7	See above
162:9-162:17	See above
163:12-163:15	See above
168:7-168:11	Relevance; confusing
169:18-171:19	Relevance; character evidence not admissible (FRE 404)
172:22-177:7	Authentication; foundation; speculation
178:6-181:23	Authentication; foundation; speculation
186:17-187:14	Speculation; foundation
194:9-194:10	
194:12-194:20	Speculation
194:22-194:23	Speculation

Andrew's Counter-Designations
59:5-60:1
65:20-66:1
66:7-9
66:13-67:2
187:15-20

MAZIN FAGIRI (11/03/06)

TP's Designation	Andrew's Objections
6:6-16	
8:6-13:6	
14:4-17:18	
18:21-23	
21:8-22:5	21:8-12 - speculation; foundation; relevance
22:7-23:23	22:15-23:23 - foundation; speculation; relevance
24:2-24:23	
29:7-32:6	29:7 - 31:8 - authentication; foundation; speculation; hearsay 31:9-31:24 - speculation; hearsay 31:25-32:6 - speculation
33:23-38:21	Relevance
38:23-40:3	Relevance

54:4-55:7	Authentication; foundation; relevance; see Andrew Evidentiary Issue No. 4; incomplete; context; best evidence; improper designation: document speaks for itself
73:17-77:4	Speculation; relevance
96:7-101:11	97:24-101:7 - hearsay; relevance; incomplete; context; best evidence; improper designation: document speaks for itself
109:3-113:12	109:3-110:3 - relevance 110:4-113:12 - authentication; foundation; speculation; relevance; hearsay
122:6-123:9	

Andrew's Counter-Designations
18:7-20
32:8-33:18
123:10-126:3
126:8-16

TERRY GARNER (9/27/06)

TP's Designation	Andrew's Objections
11:2-11	
20:14-25	20:14 - improper designation: incomplete; relevance
21:4-10	
21:21-24:11	Authentication; hearsay; relevance; incomplete; context; best evidence; improper designation: document speaks for itself
24:15-26:2	24:15-25:19 - authentication; hearsay; relevance; incomplete; context; best evidence; improper designation: document speaks for itself
26:18-27:7	
27:14-16	
27:20-25	
28:3-14	
28:8-28:23	
28:25-30:11	
30:16-23	
30:25-31:3	
33:5-6	
33:9-22	
34:1-9	
36:20-37:16	Relevance; see Andrew Evidentiary Issue No. 8
50:25-51:11	
51:16-20	
51:22-25	

58:25-60:16	Authentication; foundation; hearsay; relevance; see Andrew Evidentiary Issue No. 6; incomplete; context; best evidence; improper designation: document speaks for itself
61:7-61:14	Relevance; see Andrew Evidentiary Issue No. 6
61:16-62:24	Relevance; see Andrew Evidentiary Issue No. 6
63:6-64:5	63:6-64:2 - relevance; see Andrew Evidentiary Issue No. 6
64:14-15	
64:17-:19	
64:23-24	
65:2-10	65:8-10 - relevance; see Andrew Evidentiary Issue No. 6
66:3-12	Relevance; see Andrew Evidentiary Issue No. 6; hearsay
66:14-15	Relevance; see Andrew Evidentiary Issue No. 6
70:23-71:5	Relevance; see Andrew Evidentiary Issue No. 6
71:7-73:4	71:7 - 72:15 - authentication; foundation; relevance; hearsay 73:2-4 - speculation; foundation
73:7-18	Speculation; foundation
73:21-25	
75:14-76:15	Relevance; see Andrew Evidentiary Issue No. 6; hearsay
76:17-18	
80:4-8	80:7-8 - relevance; see Andrew Evidentiary Issue No. 6
80:10-81:14	80:10-11 - relevance; see Andrew Evidentiary Issue No. 6
82:8-82:20	
84:5-84:23	Relevance; see Andrew Evidentiary Issue No. 6
87:23-88:22	Relevance; see Andrew Evidentiary Issue No. 6; hearsay
89:14-22	89:14-20 - relevance; see Andrew Evidentiary Issue No. 6
89:24-90:17	90:13-15 - relevance; see Andrew Evidentiary Issue No. 6
90:19-23	
91:19-92:11	91:19-92:5 - relevance; see Andrew Evidentiary Issue No. 6
92:23-93:10	
93:21-94:17	Relevance; see Andrew Evidentiary Issue No. 6; hearsay
96:3-7	Relevance; see Andrew Evidentiary Issue No. 6
96:20-21	Relevance; see Andrew Evidentiary Issue No. 6
96:23-97:15	Relevance; see Andrew Evidentiary Issue No. 6
97:20-25	Relevance; see Andrew Evidentiary Issue No. 6; hearsay
98:4-10	Relevance; see Andrew Evidentiary Issue No. 6
99:17-100:8	Relevance; see Andrew Evidentiary Issue No. 6
100:14-102:6	Authentication; foundation; hearsay
102:23-103:11	
107:21-108:11	Relevance; see Andrew Evidentiary Issue No. 6
110:4-9	Relevance; see Andrew Evidentiary Issue No. 6; calls for a legal conclusion
110:12-21	Relevance; see Andrew Evidentiary Issue No. 6
110:24-111:4	Relevance; see Andrew Evidentiary Issue No. 6; calls for a legal conclusion

111:7-8	Relevance; see Andrew Evidentiary Issue No. 6
111:15-112:2	
112:8-113:6	Authentication; foundation; hearsay; relevance 113:5-6 - calls for a legal conclusion
113:9-10	
114:17-25	Relevance; speculation
115:3-14	Relevance; speculation
115:19-116:3	
116:15-116:21	Relevance
116:23-117:5	Relevance
117:-13-117:23	
117:25-118:10	
118:-12-14	
119:4-10	Calls for legal conclusion; relevance (FRE 403)
119:13-18	Calls for legal conclusion; relevance (FRE 403)
124:14-125:11	Relevance; see Andrew Evidentiary Issue No. 6
125:13-126:5	125:13-125:24 - relevance; see Andrew Evidentiary Issue No. 6
126:20-24	Improper hypothetical; speculation; calls for a legal conclusion
127:3-7	
127:9-12	Calls for a legal conclusion; speculation
127:15-20	
132-6-21	
133:9-11	
133:21-134:23	
139:4-139:22	
153:2-6	Calls for a legal conclusion; relevance (FRE 403)
153:9-13	Improper hypothetical; calls for a legal conclusion; relevance (FRE 403)
153:16-17	
154:2-5	Compound; confusing; relevance (FRE 403)
154:8-10	Compound; confusing; relevance (FRE 403)
156:21-158:14	Relevance; see Andrew Evidentiary Issue No. 8 157:24-158:14 - incomplete; context; best evidence; improper designation: document speaks for itself
159:4-20	Relevance; see Andrew Evidentiary Issue No. 8
159:23-160:6	Relevance; see Andrew Evidentiary Issue No. 8
160:9-10	Relevance; see Andrew Evidentiary Issue No. 8
160:23-24	Relevance; see Andrew Evidentiary Issue No. 8
161:2-3	Relevance; see Andrew Evidentiary Issue No. 8
164:20-165:14	Relevance; see Andrew Evidentiary Issue No. 6
166:4-166:11	Relevance; see Andrew Evidentiary Issue No. 8
166:16-17	Relevance; see Andrew Evidentiary Issue No. 8
166:20-25	Relevance; see Andrew Evidentiary Issue No. 8

173:2-8	Relevance; see Andrew Evidentiary Issue No. 8
176:13-14	Relevance; see Andrew Evidentiary Issue No. 8
176-177:2	Relevance; see Andrew Evidentiary Issue No. 8
177:5-10	Relevance; see Andrew Evidentiary Issue No. 8
177:12-16	Relevance; see Andrew Evidentiary Issue No. 8
178:4-179:9	
179:18-19	
179:22-180:8	
180:12-181:15	Foundation
186:19-187:2	
188:5-8	
189:3-189-12	Foundation 189:11-12 - lawyer testimony
192:4-11	
192:19-22	
193:2-196:12	193:10-19 - foundation 196:11-12 - relevance
196:15-198:6	196:15-17 - relevance 198:3-6 - foundation
198:9-200:5	199:23-200:3 - foundation
200:7-202:22	200:16-202:22 - foundation
205:19-206:12	Relevance; see Andrew Evidentiary Issue No. 6
207:21-209:2	Relevance; see Andrew Evidentiary Issue No. 6; hearsay; foundation
210:7-24	Relevance; see Andrew Evidentiary Issue No. 6
218:8-18	
219:20-220:10	219:25-6 - hearsay 219:7-10 - foundation
221:24-222:22	
225:16-227:6	225:16 - improper designation: incomplete 225:17-227:6 - relevance; see Andrew Evidentiary Issue No. 6
227:8-9	Relevance; see Andrew Evidentiary Issue No. 6
227:11-13	Relevance; see Andrew Evidentiary Issue No. 6
227:22-228:5	Relevance; see Andrew Evidentiary Issue No. 6
228:19-25	
229:3-229:23	
236:22-239:2	
239:21-240:20	Authentication
243:10-245:20	Relevance; see Andrew Evidentiary Issue No. 6
246:12-247:3	

250:11-16	Relevance
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Andrew's Counter-Designations
26:5-12
51:12-15
52:9-11
179:10-17
227:14-20

ROBERT GROSS (10/12/06)

TP's Designation	Andrew's Objections
04:06 – 04:08	
06:08 – 06:18	
13:02 – 13:21	
14:11 – 15:06	
18:18 – 20:15	improper designation: incomplete
20:25 – 22:08	
25:04 – 25:23	
27:03 – 29:02	
30:05 – 30:20	
33:22-25	
36:12 – 38:03	
45:23 – 49:21	47:19-49:6 - hearsay 49:17-21 - hearsay
70:11 – 72:22	
74:15 – 80:11	74:24-75:6 - hearsay
80:24 – 81:15	81:6-7 - hearsay
110:25 – 113:19	113:9-19 - vague; confusing; ambiguous

REBUTTAL ROBERT GROSS (10/12/06)

4:6-8
13:2-21
14:2-7
14:11-13
19:14-20:15
21:17-22:12
25:24-26:21
31:2-5
31:7
31:10-14
31:17-20

33:22-25
34:18-22
36:12-23
37:11-14
37:21-38:3
50:23-51:23
53:17-20
53:23-54:3
54:9-56:4
68:9-21
68:25-69:8
71:18-72:7
72:8-13
72:16-22
72:25-73:5
73:8-13
74:4-11
76:20-24
77:5-6
77:20-22
77:25-78:6
78:10-15
78:20-24
81:21-83:11
84:9-86:24
87:3
87:9-89:2
91:8-21
93:14--94:3
96:18-20

DOUGLASS HALL (10/24/06)

TP's Designation	Andrew's Objections
7:9-7:11	
8:23-11:2	
11:8-11:11	
11:21-11:25	
36:24-37:11	Relevance
38:24-39:8	
39:16-40:6	Foundation; speculation; relevance
40:9	
50:18-50:22	Foundation; authentication; speculation; personal knowledge; ambiguous

51:5	
51:7-51:10	
51:13	
59:7-60:19	Authentication; foundation; hearsay; speculation; vague
71:25-73:24	Relevance, see Andrew Evidentiary Issue No. 6; incomplete; context; best evidence; improper designation: document speaks for itself
78:10-79:19	
80:13-80:20	
80:23-81:4	Calls for a legal conclusion; speculation
81:12-81:17	
82:8-83:10	Authentication; foundation
85:3-85:18	Authentication; foundation
86:9-86:11	Authentication; foundation; misleading
86:13-86:14	See above
99:19-104:3	99:19-100:23 - authentication; foundation; speculation; hearsay 100:24-104:3 - authentication; foundation; speculation; hearsay; assumes facts not in evidence; vague and ambiguous

Andrew's Counter-Designations
39:9-10
39:14-15
40:10-13
41:16-17
41:20-22
54:23-55:3
55:5-10
81:5-7
81:10-11

IRIS INBAR (11/21/06)

TP's Designation	Andrew's Objections
6:7-7:14	
8:6-8:13	
9:2-9:6	Authentication; foundation
9:11-9:18	Authentication; foundation
9:21-10:5	
10:7-11:7	
11:15-12:14	
12:25-13:2	
13:4-13:25	
14:8-15:22	Authentication; foundation

	14:25-15:9 - relevance; see Andrew Evidentiary Issue No. 6
19:7-19:12	Foundation, hearsay, authentication
21:15-23:20	Hearsay, speculation
23:22-25:10	Speculation
25:12-25:19	Speculation
25:23-26:4	Relevance; improper designation
26:9-30:6	26:9-27:8 - hearsay 29:10-22 - speculation 30:5-6 - vague and ambiguous
30:8-31:8	Vague and ambiguous
31:10-31:22	Vague and ambiguous
31:24	Vague and ambiguous
38:12-38:24	
39:10-39:20	

Andrew's Counter-Designations
8:14-20
16:19-22
17:12-19:2
20:7-21:14
32:18-33:6
38:25-39:3

REBUTTAL IRIS INBAR (11/21/06)

12:15-24
16:5-16

STUART KATZ (11/3/06)

TP's Designation	Andrew's Objections
6:7-6:14	
8:14-16:12	
53:4-55:2	
59:19-60:6	Foundation
60:9-63:3	
63:5-63:9	
64:9-65:21	Hearsay
66:12-67:11	Hearsay; speculation
69:22-69:25	
70:17-73:6	Relevance; see Andrew Evidentiary Issue No. 4; speculation

76:11-76:20	
77:1-77:5	
77:8	
77:17-77:23	
82:16-83:9	
87:24-90:14	89:25-90:14 - improper hypothetical; speculation; assumes a fact not in evidence
92:12-92:23	Improper hypothetical; speculation; assumes a fact not in evidence
93:2-94:9	Improper hypothetical; speculation; assumes a fact not in evidence
94:11-96:5	Improper hypothetical; speculation; assumes a fact not in evidence
96:7-96:20	
102:9-102:18	Relevance; see Andrew Evidentiary Issue No. 4; authentication; foundation; hearsay; improper designation; speculation
118:12-119:16	Authentication; foundation; incomplete; context; best evidence

Andrew's Counter-Designations
63:10-12
69:12-21
73:7-9
74:12-23
74:25-75:11
75:15-76:10
76:21-25
77:24-78:2
83:10-18
83:21-84:7
84:10-85:4
85:8-87:23
91:15-17;
91:18-92:11
96:21-97:9

JOSEPH KENNEDY 30(b)(6) VOLUME 1 (10/16/06)

TP's Designation	Andrew's Objections
9:5-9:12	
9:17-10:3	
10:5-10:6	
10:8-10:10	
10:13-10:16	
10:18-11:3	
11:5-11:14	
11:19-12:7	
12:9-12:25	

13:3-13:19	13:12-14:4 - speculation
	14:15-15:6 - relevance; see Andrew Evidentiary Issue No. 6
13:22-15:6	See above
16:8-16:11	Relevance; see Andrew Evidentiary Issue No. 6
16:13-17:6	Relevance; see Andrew Evidentiary Issue No. 6
17:8-17:14	Relevance; see Andrew Evidentiary Issue No. 6
19:11-19:12	
19:14-19:19	
30:8-31:11	
32:6-33:6	
33:9-33:25	
34:4-34:8	
43:9-44:12	
44:15-45:8	44:15-45:4 - hearsay
45:10-45:14	
45:17-45:24	
46:2-46:12	46:2-6 - calls for a legal conclusion
47:4-47:19	
51:20-52:15	52:13-15 - beyond the scope
52:19-52:23	Beyond the scope
53:17-53:20	
53:22-53:25	
55:16-55:22	Beyond the scope
55:25-56:8	Beyond the scope
56:10-56:17	Beyond the scope
56:20-56:25	Beyond the scope
57:3-57:6	Beyond the scope
57:8	Beyond the scope
57:15-57:17	
57:19-57:22	
57:25-58:7	
58:19-59:2	
67:3-68:24	67:3-6 - relevance
69:2-70:6	
73:7-73:9	
73:12-73:18	
73:21-73:24	
74:2-74:11	
74:13-74:17	
74:20-74:23	
74:25-75:9	
75:11-75:19	
75:23-76:5	
76:7-76:8	

77:24-79:24	
80:3-81:5	81:3-5 - improper designation
81:7-81:12	
89:19-91:8	
92:7-92:9	
92:13-93:10	92:16-93:10 - relevance
98:9-98:12	
98:14-99:6	98:21-99:6 - relevance; see Andrew Evidentiary Issue No. 4
99:9-99:13	
100:17-101:16	
102:18-104:4	
104:6-104:10	
104:12-104:21	
105:21-106:15	
107:11-107:15	
112:24-113:23	
114:2-115:6	
115:8-115:20	
115:23-116:4	
117:2-117:13	
118:20-119:5	
119:8-119:12	
119:15-119:20	
119:23-120:3	
120:6-121:4	
121:6-121:12	
121:15-121:19	
122:6-122:23	
122:25-123:14	
123:17-124:7	
124:9-124:11	
124:14-124:24	
125:3-125:10	
125:12-125:17	
125:20-125:24	
126:1-126:7	
126:9-126:13	
126:16-126:19	
127:10-127:15	
127:17-129:17	
129:19-129:22	
129:24-130:7	
131:14-131:17	
131:19-132:2	
132:18-132:23	132:21-133:4 - relevance

132:25-133:4	See above
133:16-133:19	See above
133:23-134:4	See above
140:5-141:11	Relevance; see Andrew Evidentiary Issue No. 6
141:14-142:20	Relevance; see Andrew Evidentiary Issue No. 6
142:23-144:4	Relevance; see Andrew Evidentiary Issue No. 6

Andrew's Counter-Designations
18:13-19:7 ²
52:16-18
52:24-53:16
54:2-55:2
55:23-24
56:18-19
57:9-14
76:16-23
81:13-82:2
83:18-84:13
99:14-100:13
106:20-23
108:2-17; 109:13-14
108:22-109:8
109:21-22
126:20-127:9
134:5-7
134:14-18
134:24-135:25

JOSEPH KENNEDY 30(b)(6) VOLUME 2 (10/17/06)

TP's Designation	Andrew's Objections
152:15-153:8	
153:11-154:13	
158:25-159:3	Calls for a legal conclusion
159:6-160:14	159:6-20 - calls for a legal conclusion
160:16-162:17	
164:10-166:25	
168:22-169:9	Beyond the scope; relevance; see Andrew Evidentiary Issue No. 6
169:14-169:17	Beyond the scope; relevance; see Andrew Evidentiary Issue No. 6
171:24-172:13	
172:16-173:4	
174:21-174:23	

² Counter is to be read only if the Court allows testimony regarding Al-Misehal.

175:2-177:14	177:6-10 - hearsay; relevance; see Andrew Evidentiary Issue No. 6
182:24-183:2	182:24-185:23 - beyond the scope; relevance
183:9-183:11	See above
183:14	See above
183:16-183:20	See above
183:23-184:24	See above
185:4-185:8	See above
185:11-185:23	See above
221:19-223:20	Relevance
223:23-224:12	Relevance
224:14-226:3	224:14-225:25 - relevance 226:2-230:20 - relevance; speculation
226:5-226:7	See above
226:9-226:17	See above
226:20-227:3	See above
227:6-227:13	See above
227:16-228:2	See above
228:4-228:14	See above
228:17-228:25	See above
229:3-229:23	See above
229:25-230:5	See above
230:8-230:15	See above
230:18-230:23	See above
231:2-231:11	
231:14-231:25	
232:3-232:23	232:3-24 - hearsay 232:3-233:24 - relevance; speculation
232:25-233:4	See above
233:7-233:16	See above
233:19-234:9	See above
234:11-234:13	234:1-236:14 - relevance
234:15-234:21	See above
234:24-235:5	See above
235:8-235:15	See above
235:18-235:24	See above
236:3-236:8	See above
236:11-236:14	See above 236:7-14 - speculation
238:6-239:20	239:9-17 - hearsay; incomplete; context; best evidence; document speaks for itself
240:5-240:13	
242:17-242:19	242:17-245:19 - relevance; speculation

242:22-243:25	See above
244:3-245:9	See above
	244:17-245:19 - hearsay
245:12-245:19	Relevance; speculation; hearsay
253:4-253:13	
253:16-254:22	254:22 - speculation
254:25-255:6	254:25-255:4 - speculation
255:9-256:10	
256:13-256:19	
258:6-258:8	
258:11	
260:5-260:14	
260:17-261:4	
261:6-261:17	
261:20-262:16	
262:19-262:23	

Andrew's Counter-Designations

162:18-25

REBUTTAL JOSEPH KENNEDY 30(b)(6) VOLUME 2 (10/17/06)

265:22-266:15

JOSEPH KENNEDY- PERSONAL DEP (10/17/06)

TP's Designation	Andrew's Objections
05:15 – 05:23	
06:04 – 07:19	
11:08 – 11:17	
12:11 – 12:12	
12:15 – 12:19	
12:22 – 13:04	
13:06 – 13:08	
14:08 – 14:10	
17:06 – 17:07	
17:10 – 17:13	
21:13 – 21:14	
21:16 – 22:09	
22:12 – 22:14	
24:17 – 24:22	
24:25 – 25:09	
25:12 – 26:02	

26:05 – 26:09	
26:12 – 26:18	
26:21	
36:08 – 36:10	
36:13 – 37:03	
37:06 – 37:10	
37:12 – 37:17	
37:21 – 38:02	
38:05 – 38:10	
38:13 – 38:19	
38:22 – 39:09	
39:13	
43:22 – 44:03	
44:06 – 44:20	
44:23 – 45:04	
45:07 – 45:14	
45:16 – 45:18	
45:20 – 45:22	
45:24 – 46:08	
46:11	
54:25 – 56:11	
56:14 – 56:18	
56:21 – 56:24	
57:03 – 57:07	
57:10	
59:19 – 59:25	
60:24 – 61:12	
61:15 – 61:20	
61:23 – 62:03	
62:06 – 63:10	
63:14 – 63:21	
67:18 – 68:09	Relevance; see Andrew Evidentiary Issue No. 6
68:19 – 69:04	Cumulative
69:07 – 69:17	Cumulative
69:20 – 60:23	Cumulative
70:02 – 70:06	Cumulative
70:09	Cumulative
70:24 – 71:12	71:10-12 - cumulative; improper hypothetical
71:18 – 71:22	Cumulative; improper hypothetical
71:24 – 72:07	Cumulative; improper hypothetical
74:25 – 75:07	
75:10 – 75:16	
75:17 – 76:06	Relevance; see Andrew Evidentiary Issue No. 4; hearsay
76:09 – 76:22	Relevance; see Andrew Evidentiary Issue No. 4; hearsay

Andrew's Counter-Designations
11:24-12:10
14:16-23
16:3-17:5
17:17
17:22
17:25-18:14
18:16
18:19-19:3
19:19-21
19:24
20:2-11
20:13-17
20:20-24
28:15-23
29:2-14
34:12-14
34:17-19
34:21-35:10
43:4-17
43:20
46:13-15
46:19
46:21-47:2
47:5-11
57:12-13
57:16
64:12-13
64:18-24
70:11-13;
70:16-22
71:13-15
73:25-74:18

REBUTTAL JOSEPH KENNEDY- PERSONAL DEP (10/17/06)

30:11-13
30:16-23

JOSEPH KENNEDY - 2ND RULE 30(b)(6) (11/9/06)

TP's Designation	Andrew's Objections
06:06 – 06:13	

07:07 – 08:15	
13:06 – 14:24	
15:05 – 22:14	
35:13 – 35:15	
35:19 – 35:20	
36:10 – 36:11	
36:14 – 36:18	
39:14 – 40:02	
45:04 – 46:15	46:13-46:15 - beyond the scope
46:19 – 47:09	46:19-47:9 - beyond the scope
47:12 – 52:17	47:12 - beyond the scope 49:4-9 - hearsay; incomplete; context; best evidence; document speaks for itself 50:6-51:21 - hearsay; incomplete; context; best evidence; document speaks for itself 52:14-17 - beyond the scope; asked and answered; cumulative
52:21 – 53:02	52:21 - beyond the scope; asked and answered; cumulative 52:23-53:2 - beyond the scope; hearsay; incomplete; context; best evidence; document speaks for itself
53:05 – 53:10	Beyond the scope; hearsay; incomplete; context; best evidence; document speaks for itself
63:09 – 63:11	Beyond the scope
63:14 – 63:18	Beyond the scope
63:22 – 63:24	
64:18 – 64:20	Beyond the scope
64:24 – 65:16	Beyond the scope
65:20 – 65:24	Beyond the scope
101:05 – 102:05	
102:07 – 102:15	
103:21 – 108:04	104:24-105:22 - incomplete; context; best evidence; document speaks for itself
108:10 – 108:21	
108:23	
120:10 – 120:12	Cumulative; asked and answered; improper hypothetical
120:15 – 120:19	Cumulative; asked and answered; improper hypothetical
120:22 – 121:07	Cumulative; asked and answered; improper hypothetical
121:10 – 121:15	
121:17	
126:08 – 126:09	
126:13 – 126:21	
126:24 – 127:07	

127:11 – 127:14	
127:17	
127:21 – 128:04	
128:08 – 128:10	
138:14 – 139:11	138:18-139:6 - hearsay; incomplete; context; best evidence; document speaks for itself
139:15 – 139:19	
139:22	

Andrew's Counter-Designations
40:4-8
40:19-25
44:17-45:3
46:16-18
47:10-11
52:18-20
53:3-4
53:20-23
53:24-54:17
57:14-58:3
58:12-13
63:12-13
63:19-21
65:17-19
120:13-14
120:20-21
121:8-9
124:16-20
124:22-24

REBUTTAL JOSEPH KENNEDY - 2ND RULE 30(b)(6) (11/9/06)

53:20-23
53:24-54:17

JOSEPH KENNEDY - 3RD RULE 30(b)(6) (11/9/06)

TP's Designation	Andrew's Objections
6:3-6:8	Relevance
7:24-9:5	7:24-8:12 - relevance 8:20-9:5 - relevance
18:14-24	18:24 - improper designation: incomplete; relevance
27:25-28-22	27:25-28:16 - foundation; assumes facts not in evidence

	28:17-22 - improper designation: incomplete
28:11-28:16	improper designation: incomplete; duplicative of above
32:6-32:23	
34:4-34:18	Authentication; foundation; hearsay
34:20-35:5	34:23-35:5 - improper designation; incomplete; context; best evidence; document speaks for itself
35:10-35:11	Foundation
35:14-36:18	Vague; speculation; foundation
36:10-36:12	See above; duplicate of above
36:14-36:16	See above; duplicate of above
36:19-36:25	Relevance; see Andrew Evidentiary Issue No. 4; overbroad; vague
37:3-38:3	See above
38:6-38:12	See above
38:14-38:18	See above
39:7-40:2	39:7-23 - relevance; see Andrew Evidentiary Issue No. 6; authentication; hearsay; vague 39:24-40:2 - authentication; hearsay; vague
40:4-40:14	Authentication; hearsay; vague
40:16-40:20	See above
40:22-40:25	See above
41:3-41:9	Authentication; hearsay; vague
41:11-41:12	
41:13-41:24	Authentication
42:3-42:8	Authentication
42:10-42:18	Authentication; vague; hearsay; relevance
42:20-43:19	Relevance
53:12-54:6	Authentication
54:8-54:10	
54:17-54:19	
54:21-54:23	
61:25-62:15	Relevance
62:17-62:24	Calls for legal conclusion
63:3-63:7	
63:9-63:21	Calls for legal conclusion
63:24-64:3	
64:5-64:12	Authentication
66:13-66:19	
67:22-67:23	Authentication; foundation
67:25-68:8	Authentication; foundation
69:2-69:4	Improper designation: incomplete
69:8-69:24	Beyond the scope
70:15-70:22	Beyond the scope
72:21-73:5	Relevance; see Andrew Evidentiary Issue No. 4

74:12-76:18	Relevance; see Andrew Evidentiary Issue No. 4 75:13-76:18 - authentication
74:19-76:24	Authentication; relevance; see Andrew Evidentiary Issue No. 4
77:2-77:20	Speculation; relevance; see Andrew Evidentiary Issue No. 4
77:22-79:11	See above
79:20-80:13	See above
81:11-81:21	Improper designation: incomplete; vague
81:23-82:20	
82:22-83:2	
85:8-85:25	

Andrew's Counter-Designations
33:8-34:3
35:6-9
41:25
63:8
69:5-7
69:25-70:3
70:9-14
76:25
77:21
82:21

TITSHING ALAN LI (10/14/06)

TP's Designation	Andrew's Objections
6:6-6:11	
6:24-7:17	
7:21-8:2	
8:10-9:16	
10:2-11:18	
12:10-12:17	
12:20-16:14	
17:23-19:22	
19:24-20:21	
24:16-27:10	
27:25-28:20	
28:24-29:10	
29:15-31:22	31:2-13 - lack of personal knowledge
32:4-32:7	32:6-13 - hearsay
32:10-32:22	See above 32:22 - hearsay

33:2-33:7	33:2-3 - hearsay
33:9-34:8	
34:11-35:1	
36:8-36:23	
37:4-38:9	
42:24-45:23	43:5-12 - lack of personal knowledge 44:14-45:8 - lack of personal knowledge
46:9-47:5	47:2-5 - lack of personal knowledge
48:17-48:21	
49:4-50:1	
51:15-52:5	Relevance; see Andrew Evidentiary Issue No. 6
53:2-54:1	
54:20-55:19	
57:4-58:1	
60:3-60:6	
60:17-61:11	Relevance; see Andrew Evidentiary Issue No. 6
62:15-65:15	
65:18-65:24	
66:1-66:12	Hearsay
66:14-66:24	Hearsay
67:2-67:6	Hearsay
67:8-67:13	Hearsay
67:15-68:8	67:15-25 - hearsay 68:1-8 - hearsay
68:22-69:9	Hearsay
70:13-71:18	
72:2-73:15	
73:22-76:3	
76:6-77:3	76:15-77:3 - hearsay
77:15-78:2	78:1-2 - improper designation: incomplete
78:6-78:7	
78:9-79:17	79:6-17 - hearsay
80:7-81:22	80:7-9 - hearsay 80:10-22 - competence (FRE 601) 80:23-81:22 - hearsay
82:14-82:18	
82:25-83:18	83:17-18 - lack of personal knowledge
83:21-84:9	83:21-84:1 - lack of personal knowledge
86:10-86:22	Relevance; see Andrew Evidentiary Issue No. 6
87:12-88:1	87:12-17 - hearsay; relevance; see Andrew Evidentiary Issue No. 6

	87:18-88:1 - relevance; see Andrew Evidentiary Issue No. 6
92:19-93:3	
95:6-95:15	95:13-15 - lack of personal knowledge
95:18-96:25	95:18-20 - lack of personal knowledge
98:1-98:12	
99:17-100:6	
100:10-100:14	
101:6-104:11	
111:6-111:25	Relevance; see Andrew Evidentiary Issue No. 6
112:19-112:23	Relevance; see Andrew Evidentiary Issue No. 6
120:9:122:4	
123:1-124:1	
126:25-127:18	
135:4-135:15	
135:21-136:3	
137:8-140:23	138:24-139:7 - lack of personal knowledge
144:24-145:13	
147:19-147:23	
149:1-149:13	
152:9-152:17	
152:23-153:13	
154:2-154:6	
159:5-159:14	159:5-9 - lack of personal knowledge
161:2-161:9	
162:13-162:16	

Andrew's Counter-Designations
31:23-32:3
35:8-17
38:17-39:3
40:18-41:2
41:10-13
54:2-5
59:19-24
70:6-9
90:16-19
97:1-10
97:14-22
100:15-22
112:24-113:3
114:13-16
116:19-117:9
122:5-7
131:9-21
134:4-14

135:2-3
136:4-16
163:3-5
163:11-13

OSKAR MAGNUSSON PERSONAL DEP. (11/8/06)

TP's Designation	Andrew's Objections
06:08 – 06:10	
06:24 – 07:02	
11:10 – 12:11	
21:06 – 21:25	Relevance; confusing
37:05 – 38:19	
38:21 – 40:13	38:21-41:7 - foundation; speculation; incomplete; context; best evidence; improper designation: document speaks for itself
40:15 – 44:02	See above
53:05 – 54:11	Incomplete; context; best evidence; improper designation: document speaks for itself
62:03 – 63:10	Relevance
63:12 – 64:11	Relevance
64:13 – 65:05	Relevance
65:07 – 65:13	
65:16 – 67:04	65:16 - 67:4 - relevance; speculation; foundation
67:08 – 67:22	67:8-22, 25 - foundation; speculation; relevance
67:25	See above

Andrew's Counter-Designations
7:3-8:25
10:2-5
12:12-13:12

REBUTTAL OSKAR MAGNUSSON PERSONAL DEP. (11/8/06)

44:9-18
44:20
44:22-25

OSKAR MAGNUSSON 30(b)(6) (11/8/06)

TP's Designation	Andrew's Objections
08:06 – 08:11	
10:06 – 11:16	
12:19 – 12:21	

13:09 – 14:06	
14:12 – 15:15	
15:21 – 16:21	
17:02 – 17:25	
18:07 – 19:07	
19:13 – 20:22	
36:11 – 36:17	
36:20 – 39:19	
39:21 – 40:07	
42:04 – 42:21	
76:13 – 76:16	
76:18 – 77:04	
77:06 – 77:10	
99:02 – 99:24	
100:20 – 100:21	
100:25 – 101:11	
101:14 – 101:19	
102:03 – 102:21	
103:02 – 104:07	
104:18 – 105:10	
105:14 – 105:15	
107:05 – 107:08	
109:10 – 110:03	
121:05 – 122:16	122:9-16 - relevance
124:05 – 124:14	
133:07 – 134:04	
191:05 – 191:09	Overbroad
191:11 – 191:17	Overbroad
191:19 – 191:20	
191:24 – 194:11	Beyond the scope
194:14 – 195:11	Beyond the scope
195:14 – 195:22	
196:02 – 196:15	

Andrew's Counter-Designations
8:11-13
40:8-10
40:21-25
41:20-42:3
74:4-24
189:9-190:2
194:12-13
195:12-13

REBUTTAL OSKAR MAGNUSSON 30(b)(6) (11/8/06)

124:15-132:18
146:6-147:7
147:21-148:13
148:16-25
164:13-18
164:21-165:16
170:24-171:16
173:23-175:3
175:17-176:25
189:5-7

JAMES MCDANIEL (9/29/06)

TP's Designation	Andrew's Objections
7:7-7:12	
11:16-11:18	
13:3-13:9	
13:15-14:17	
21:13-22:3	
22:11-22:16	
24:15-24:18	
24:23-24:25	
25:6-25:11	
26:8-26:12	
26:16-27:4	
29:12-30:17	
31:12-31:17	
36:25-37:5	
37:15-37:22	
41:21-42:5	Relevance
51:15-52:2	
52:20-52:25	
54:8-54:23	
59:5-60:7	Relevance
75:16-76:3	Authentication; foundation
114:23-115:11	
116:15-117:17	117:16-17 - confusing; duplicative
117:22-117:25	
118:11-118:24	118:21-119:4 - speculation; foundation
119:3-122:10	119:23-120:5 - speculation; foundation
122:21-122:24	Confusing; incomplete

128:10-128:11	
128:13-129:2	
129:4-129:17	
132:10-133:21	Authentication; foundation; hearsay; vague; incomplete; context; best evidence; improper designation: document speaks for itself
133:23-136:18	See above
138:3-139:3	138:13-139:14 - authentication; foundation; hearsay
139:5-139:14	See above
142:12-143:3	
143:13-145:4	
147:9-149:23	147:16-148:14 - foundation; speculation 149:13-23 - speculation
151:23-153:11	152:18-153:11 - foundation
159:21-160:6	
160:9-160:20	
183:2-183:12	Privileged
183:16-183:24	
184:1-184:14	
203:7-203:22	
216:23-218:6	
219:1-219:19	
220:3-220:12	
224:5-224:15	
240:9-241:21	Relevance; duplicative; speculation
242:3-244:16	Relevance; duplicative; foundation; speculation
244:19-244:20	See above
245:12-248:4	Incomplete; context; best evidence; improper designation: document speaks for itself
253:8-253:9	
253:12	
253:15-254:3	
254:5-254:7	
254:9-254:20	
255:6-259:5	256:13-257:11 - authentication; foundation; speculation 257:21-260:7 - authentication; foundation; speculation
259:8-260:5	See above
260:7	See above

Andrew's Counter-Designations	
39:17-23	
40:2-9	
40:11-41:2	
41:4-11	

41:14-17
41:19-20
51:7-14
53:15-18
54:2-7
115:24-25
116:5-8
143:5-12
197:22-201:22
220:3-12
220:17-18
220:22-221:7
248:5-7
248:11-13
248:15-16
249:12-20
249:23-250:8
250:11-25
251:11-12
251:14-252:9

REBUTTAL JAMES MCDANIEL

49:12-14
49:16-23
187:7-8
187:12-18
189:5-191:2
207:20-22
209:23-211:12
227:9-25
228:20-23

JAMES PETELLE (11/20/06)

TP's Designation	Andrew's Objections
04:11 – 06:14	
08:03 – 08:24	Relevance
09:09 – 11:04	Relevance; see Andrew Evidentiary Issue No. 8; FRE 408
11:07 – 11:16	Relevance; see Andrew Evidentiary Issue No. 8; FRE 408
13:16 – 15:09	14:17-15:9 - relevance; see Andrew Evidentiary Issue No. 8; FRE 408
15:22 – 17:04	15:22-16:24 - relevance; see Andrew Evidentiary Issue No. 8; FRE 408

18:08 – 18:12	
18:16 – 20:07	20:1-7 - relevance; see Andrew Evidentiary Issue No. 8; FRE 408
27:21 – 29:04	
34:18 – 35:03	34:18-24 - relevance; see Andrew Evidentiary Issue No. 8; FRE 408
35:08 – 36:01	35:8-16 - relevance; see Andrew Evidentiary Issue No. 8; FRE 408

RANDY WYNN (10/10/06)

TP's Designation	Andrew's Objections
7:1-7:9	
8:17-8:18	
10:1-11:10	10:6-18 - relevance
11:24-12:19	
13:9-14:3	
36:2-40:13	38:10-23 - speculation; foundation 38:24-40:1 - speculation; foundation; hearsay 40:2-42:14 - incomplete; context; best evidence; improper designation: document speaks for itself 42:15-21 - foundation; speculation 42:22-44:1 - incomplete; context; best evidence; improper designation: document speaks for itself
40:16-42:17	See above
42:20-44:1	See above
48:3-49:8	48:3-15 - speculation; foundation; authentication
49:16-49:18	Improper designation: incomplete
51:1-53:5	
63:25-64:19	
64:23-66:15	Authentication; foundation; speculation; relevance
66:18-67:3	Same as above
67:18-70:12	Authentication; foundation; speculation; relevance
70:14-76:18	70:14-73:21 - authentication; foundation; speculation; relevance 74:6-14 - authentication; foundation; speculation 74:22-77:8 - authentication; foundation; speculation; relevance
76:21-77:5	See above
77:7-78:25	77:9-79:16 - authentication; foundation; speculation; relevance
79:10-79:16	See above

80:20-82:24	
83:1-83:3	
85:13-85:16	
85:19-85:24	Speculation; relevance
86:12-90:10	
92:3-92:19	
93:24-94:11	
97:1-97:22	Relevance; foundation; authentication
98:1-99:12	98:1-4 - relevance; foundation; authentication 98:5-99:12 - foundation; speculation
99:16-100:14	99:16-101:16 - authentication; foundation; speculation
100:17-101:3	See above
101:7-101:16	See above
102:7-104:21	102:7-15 - foundation; relevance
105:6-105:17	
105:23-106:3	
106:6-106:25	
113:23-116:13	Relevance; see Andrew Evidentiary Issue No. 9; hearsay; confusing; misleading
116:21-117:5	See above
117:14-117:16	See above
118:24-118:25	Relevance
119:3-119:8	Relevance
120:3-121:12	120:3-9 - relevance 120:10-121:12, 23-24 - authentication; foundation; speculation
121:22-122:4	121:24-122:4 - relevance
123:7-123:8	Relevance
123:14-123:16	Relevance
126:23-127:18	
127:24-128:21	
129:12-129:18	
129:21-132:1	
132:15-133:11	
142:6-144:13	Foundation; authentication; relevance; hearsay; incomplete; context; best evidence; improper designation: document speaks for itself
144:17-144:25	Foundation; relevance; incomplete; context; best evidence; improper designation: document speaks for itself
145:3-146:5	Relevance; hearsay
146:11-149:4	Foundation; speculation; relevance; incomplete; context; best evidence; improper designation: document speaks for itself
149:21-151:8	Authentication; foundation; speculation; hearsay
151:15-152:15	Same

	151:17-18 - duplicative
	151:23-152:24 - authentication; foundation; hearsay
152:18-152:24	See above
156:6-157:10	Relevance; hearsay; authentication; foundation
157:19-159:2	Relevance; hearsay; authentication; foundation
159:6-159:8	Foundation; speculation
163:21-164:9	Foundation; speculation
164:20-165:2	See above
166:19-167:1	Speculation; foundation
173:15-179:11	174:14-19, 175:6-11 - speculation; personal knowledge
179:13-182:18	179:18-181:2 - foundation; speculation
	181:22-182:12 - foundation; speculation
185:17-188:5	186:1-187:12 - hearsay
	187:14-188:9 - foundation; speculation; hearsay
188:8-188:9	See above

Andrew's Counter-Designations
12:20-13:1
14:18-15:24
40:14-15
79:1-9
83:4-84:20
90:11-92:2
100:15-16
122:5-123:6
123:9-13
123:21-25,
124:2-21
144:14-16
146:6-10
149:5-17
159:3-5
159:24-160:1
161:9-10
162:7-11
164:10-15
164:17-19
165:3-15
165:17-20
165:22-166:8
188:11-17

188:25-189:22

TruePosition, Inc. v. Andrew Corporation, No. 05-747-SLR
Andrew Corporation's Objections and Counter-Designations to
TruePosition's Rebuttal Deposition Designations
August 17, 2007

The following is a list of Andrew's objections and counter-designations in response to TruePosition's rebuttal deposition designations. Andrew reserves the right to supplement these objections and counter-designations as it completes its work on the pretrial order. Andrew incorporates its Objections to TruePosition's Trial Exhibit List and reserves the right to make additional objections to documents that are the subject of these designations. Andrew reserves the right to make additional objections and counter-designations to those designations that are incomplete as listed here. Andrew incorporates its Evidentiary Issues by reference and reserves the right to supplement these objections and counter-designations based on the Court's rulings on those Evidentiary Issues. Andrew reserves the right to supplement these objections and counter-designations based on the Court's rulings on the pending claim construction issues and summary judgment issues.

ROBERT GROSS (10/12/06)

TP's Designation	Andrew's Objections
27:03-27:18	
30:05-30:20	
36:12-38:05	
38:08-38:09	
43:07-43:16	
45:23-50:22	47:19-49:6 - hearsay 49:17-21 - hearsay
74:15-80:11	74:24-75:6 - hearsay
80:24-81:15	81:6-7 - hearsay
99:21-100:10	
115:10-117:9	Relevance ¹

Andrew's Counter-Designations
100:13-101:13

¹ As used herein, "relevance" objections encompass objections under both FRE 402 and 403.

JOSEPH KENNEDY- PERSONAL DEP (10/17/06)

TP's Designation	Andrew's Objections
23:21-24:4	23:21-24 - improper designation: incomplete.
24:7	
46:21-24	calls for a legal conclusion
64:12-13	calls for a legal conclusion
64:18-24	calls for a legal conclusion

Andrew's Counter-Designations
46:25-47:11

OSKAR MAGNUSSON PERSONAL DEP. (11/8/06)

TP's Designation	Andrew's Objections
34:06-34:15	34:14-15 - vague
34:17-34:18	
34:25-35:04	
35:7-35:10	

OSKAR MAGNUSSON 30(b)(6) (11/8/06)

TP's Designation	Andrew's Objections
110:24-113:3	111:24-112:21 - incomplete; context; best evidence; improper designation: document speaks for itself 112:25-113:3 - calls for a legal conclusion
113:17-113:23	
163:3-165:15	Beyond the scope 164:6-11 - speculation
166:5-167:23	

Andrew's Counter-Designations
168:8-16
168: 21-169:17

RHYS ROBINSON (1/5/07)

If the testimony of Mr. Robinson designated by Andrew is found to be hearsay, then Andrew objects to each and every rebuttal designation of Mr. Robinson's testimony by TruePosition as hearsay. Andrew also has the following objections to TruePosition's rebuttal deposition designations for Mr. Robinson:

TP's Designation	Andrew's Objections
200:22-201:19	
201:22-202:14	Foundation 202:11-14 - vague
202:21	
202:24-203:5	
203:8-204:3	203:19-204:3 - calls for a legal conclusion
204:7-9	
205:2-4	
205:15-206:7	Foundation; vague
206:11-14	
230:16-233:19	
263:4-11	Overbroad; vague
263:16-18	Overbroad; vague
263:21-264:3	Overbroad; vague; compound
264:7-265:2	
265:6-7	
265:11-12	
268:24-269:5	Overbroad; vague
269:8-13	Overbroad; vague
269:17-270:14	270:7-14 - compound; ambiguous; overbroad
270:22-271:6	Overbroad; vague; ambiguous
271:10-19	Compound; assumes a fact; vague
271:23-272:23	272:20-23 - Overbroad; vague
273:5-10	Vague and ambiguous; calls for a legal conclusion
273:14-19	
273:21-274:2	Vague and ambiguous; calls for a legal conclusion
274:6-7	
274:12-16	Vague and ambiguous; calls for a legal conclusion
274:21-275:19	275:16-19 - overbroad; assumes a fact
275:23	
279:9-281:21	Relevance 279:9-19 - improper designation: incomplete 280:12-19 - incomplete; context; best evidence 281:19-21 - calls for a legal conclusion; vague; ambiguous
282:1-282:17	282:12-17 - argumentative; vague; ambiguous
327:4-332:4	Relevance; hearsay; incomplete; context; best evidence 332:3-4 - calls for a legal conclusion
332:8-10	
363:7-366:15	Relevance; confusing, misleading, and unfairly prejudicial to Andrew 363:24-364:20 - hearsay; incomplete; context; best evidence; improper designation: document speaks for itself
368:16-369:3	Relevance; confusing, misleading, and unfairly prejudicial to Andrew

383:15-388:6	Relevance; confusing, misleading, and unfairly prejudicial to Andrew 384:11-21 - hearsay; incomplete; context; best evidence 385:5-14 - hearsay; incomplete; context; best evidence 386:20-387:1 - hearsay; incomplete; context; best evidence 387:9-12 - hearsay; incomplete; context; best evidence
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Andrew's Counter-Designations
270:17-18
397:12-25
398:4-5
399:13-17